

Remarks

Claims 1-9, 11-15 and 17-23 are pending in the application. Claims 12-14 have been withdrawn from consideration pursuant to a restriction requirement, and claims 10 and 16 has been canceled without prejudice or disclaimer. Claims 1-11 and 15-23 have been rejected.

The drawings were objected to. Withdrawal of the objection is respectfully requested in light of the replacement sheet for original Fig. 2. Specifically, the four parts of original Fig. 2 are respectively relabeled as Figs. 2A, 2B, 2C and 2D.

Clarification of claim 16 was requested. Claim 16 has been canceled without prejudice or disclaimer.

Claims 1, 2, 4-6, 15 and 17 were rejected under 35 USC 102(b) as being anticipated by Great Britain 2 263 393 (hereinafter, "GB '393").

The Applicant respectfully submits that GB '393 does not support the rejection of the claims as amended above, for at least the reason that GB '393 does not disclose a brush disposed between two rollers as required by independent claims 1, 2 and 4. Accordingly, claims 1, 2 and 4 are allowable over GB '393. Claims 5, 6, 15 and 17 incorporate the features of claim 4 by dependency and consequently are allowable over GB '393 for at least that reason. Withdrawal of the rejection of claims 1, 2, 4-6, 15 and 17 as anticipated by GB '393 is accordingly respectfully requested.

Claims 1-7, 17, 20 and 21 were rejected under 35 USC 102(b) as being anticipated by Bredin '494 (US 2,755,494). Withdrawal of this rejection is respectfully requested in light of the amendments to independent claims 1, 2, 3 and 4. More specifically, there is no disclosure in Bredin '494 of a brush disposed between two rollers as required by these independent claims, and therefore claims 1-4 are allowable over Bredin '494. Claims 5-7, 17, 20 and 21 depend on claim 4 and are therefore likewise allowable over Bredin '494 for at least the reason that they incorporate the features of claim 4. Accordingly, withdrawal of the rejection of claims 1-7, 17, 20 and 21 as anticipated by Bredin '494 is respectfully requested.

Claims 10, 11, 16, 18, 19, 22 and 23 were rejected under 35 USC 103(a) as being unpatentable over Bredin '494 in view of Germany 26 20 235. Of these, claims

11, 18, 19, 22 and 23 remain pending, claims 10 and 16 having been canceled without prejudice or disclaimer.

To establish a *prima facie* case of obviousness under Section 103, all claim limitations of a claimed invention must be taught or suggested by the prior art. See MPEP, Section 2143.03 and *In re Royka*, 490 F.2d 981, 180 USPQ 580 (CCPA 1974). In view of the foregoing authority, the Applicant respectfully submits that the cited references do not support the asserted rejection.

Claims 11, 18, 19, 22 and 23 depend on claim 4 and therefore incorporate its features. Claim 4 recites, among other things, "at least one brush disposed between at least two of said plurality of rollers". As noted above, Bredin '494 does not disclose a brush disposed between two rollers as required by claim 4. Moreover, Germany 26 20 235 does not remedy the deficiencies in Bredin '494. While Germany 26 20 235 shows brushes, the brushes are disposed to either side of a single roller. This clear structural difference from the device recited in independent claim 4 causes the device disclosed in Germany 26 20 235 to operate very differently. More specifically, if the device shown in Germany 26 20 235 is applied to a surface, it is apparent that the laterally-arranged brushes will push dirt away from the centrally-arranged roller in whatever direction the device is applied. Thus, the brushes may actually frustrate the disclosed purpose of the "sticky roller," that of removing dirt, by making the dirt inaccessible to the roller at the same time as the roller is applied. By contrast, in the device as recited in claim 4, dirt dislodged from a surface by the brush will be collected by one of the rollers to either side of the brush, in whatever direction the device is applied. Accordingly, it is clear that the structure recited in claim 4 is patentably distinct from that disclosed in Germany 26 20 235. Therefore, withdrawal of the rejection of claims 11, 18, 19, 22 and 23 as unpatentable over Bredin '494 in view of Germany 26 20 235 is respectfully requested.

Claims 1, 2, 4-9, 17 and 21 were rejected under 35 USC 102(b) as being anticipated by Germany 35 00 036. Claims 1, 2, 4-7, 20-21 were rejected under 35 USC 102(b) as being anticipated by Hester (US 4,083,075). As noted earlier, each of independent claims 1, 2 and 4, and consequently claims dependent thereon, include the feature of a brush disposed between two rollers. Neither Germany 35 00 036 nor

Hester discloses this feature. Accordingly, withdrawal of the asserted rejections is respectfully requested.

In light of the above discussion, Applicant respectfully submits that the present application is in all aspects in allowable condition, and earnestly solicits favorable reconsideration and early issuance of a Notice of Allowance.

The Examiner is invited to contact the undersigned at (202) 220-4323 to discuss any matter concerning this application. The Office is authorized to charge any fees under 37 C.F.R. 1.16 or 1.17 related to this communication to Deposit Account No. 11-0600.

Respectfully submitted,

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